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FACT AND FICTION: VENEZUELAN EDUCATION REFORM LAW

Laurie Arnoldy*

I. INTRODUCTION

ON August 15, 2009 Hugo Chavez enacted the Organic Education Law (“Law” or “Education Law”), and triggered a contagion of controversy and criticism across Venezuela and the rest of the world.¹ The clash between Chavez supporters and right-wing activists neither began nor ended on that date; however, many of the conflicts between the sides are rooted in the policy and ideas incorporated in this law.² The Law focuses on the education system and its constituent parts, yet goes beyond the traditional scope of education and seeks to create a seamless society based on fundamental principles that are universally applicable to Venezuelan culture.³

II. BACKGROUND

The Venezuelan National Assembly passed the Law after a twelve-hour legislative session; however, the bill had been in the making since its first draft in August 2001.⁴ “Organic” designates the Law as being of the highest legal authority.⁵ Therefore, application and enforcement of the

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1. *Fact Sheet: Venezuela's New Education Law Myth and Reality*, EMBASSY OF THE BOLIVARIAN REPUBLIC TO THE UK AND IRELAND, Sept. 14, 2009, http://www.venezlon.co.uk/pdf/fs_Ley_educacion.pdf; Posting of David D. Sussman, *Rallies Against Chavez Organized Worldwide*, VENEZUELA: THE WORLD AFFAIRS BLOG NETWORK, <http://venezuela.foreignpolicyblogs.com/2009/09/04/rallies-against-chavez-organized-worldwide> (Sept. 4, 2009).
2. See Posting of rowlandkeshena, *Venezuela's Education Law Restructures, Democratizes Elite Institutions*, SPEED OF DREAMS, <http://bermudaradical.wordpress.com/2009/09/17/venezuelas-education-law-restructures-democratizes-elite-institutions/> (Sept. 17, 2009, 16:33).
3. Ley Orgánica de Educación, art. 3, 6, 14, 15, 33 (Venez.), available at www.eluniversal.com/2009/08/17/LOE.pdf; Posting of James Suggett, *Venezuelan Education Law: Socialist Indoctrination or Liberatory Education?*, ENSAIOS IMPERFEITOS, <http://ensaiosimperfeitos.blogspot.com/2009/08/venezuelan-education-law-socialist.html> (Aug. 23, 2009).
4. James Suggett, *Venezuelan National Assembly Passes New Education Law*, VENEZUELANALYSIS.COM, Aug. 14, 2009, <http://www.venezuelanalysis.com/news/4722>.
5. *Id.*

Law is required by the Bolivarian Constitution ("Constitution"), and it is the current authoritative document on education for Venezuela.⁶ The Law confirms the premise in the Constitution which provides, "education is a human right and a fundamental social duty; it is democratic, free of charge, and obligatory."⁷ Additionally, it is based on the "Bolivarian Doctrine," and represents a key tenet of Chavez's revolution inspired by the 19th century Latin American leader Simon Bolivar.⁸ But due to the intense partisan opposition and significant worldwide media coverage, the exact content of the bill has been obscured, leaving many confused and keeping Venezuelan leaders on the defensive against widespread "opposition propaganda" and inflammatory rumors.⁹

Many have critiqued the Venezuelan National Assembly and the Education Law for its history of hasty decisions under "clandestine" terms.¹⁰ But debate over the education system has been flowing since Chavez took office in 1999 and has yet to die down.¹¹ Amidst widespread visible protest, public discussions with legislators were reportedly held via "street parliament" sessions where they received proposals and objections from individuals and organizations over the past eight years of drafting the bill.¹² The information and discussion assemblies were primarily organized and attended by students and university officials in favor of a new education law that incorporates socialist policies.¹³ A key reason for the majority-dominated legislature was the 2005 election boycott by Chavez opponents.¹⁴ Notably, the final version of the Law was published to the general public less than two days after its passage in multiple national daily newspapers.¹⁵

6. *Id.*

7. Posting of rowlandkeshena, *supra* note 2.

8. *Hugo Chavez Seeks to Catch Them Young*, *ECONOMIST*, Aug. 20, 2009, http://www.economist.com/world/americas/displaystory.cfm?story_id=14258760.

9. Suggett, *supra* note 3; James Suggett, *Venezuelan Education Minister Clarifies Education Law in Response to False Opposition Propaganda*, *VENEZUELA SOLIDARITY CAMPAIGN*, June 19, 2009, http://www.vicuk.org/index.php?option=com_content&task=view&id=525&Itemid=30.

10. *National Assembly Has Passed "Clandestine" Laws-Venezuelan Opposition*, *BBC WORLDWIDE MONITORING* (Aug. 30, 2009); *Hugo Chavez Seeks to Catch Them Young*, *supra* note 8.

11. *Education in Venezuela: Fatherland, Socialism or Death*, *ECONOMIST*, Oct. 13, 2007, http://www.economist.com/node/9947046?story_id=9947046; Mike Ceaser, *Venezuela Threatens to Nationalize Education*, *THE CHRON. HIGHER EDUC.*, Oct. 12, 2007, <http://chronicle.com/article/Venezuela-Threatens-to-Nati/19702/>; *Venezuela's Revolution Reaches the Classroom*, *ECONOMIST*, Jan. 25, 2001, <http://www.economist.com/node/485739>.

12. Suggett, *supra* note 4.

13. Marcus Pabian, *Venezuela's Education Revolution: Deepening Popular Democracy*, 15 *DIRECT ACTION FOR SOCIALISM IN THE 21ST CENTURY* 1, Sept. 2009, available at http://directaction.org.au/issue15/venezuelan_education_revolution_deepening_popular_democracy.

14. Suggett, *supra* note 3.

15. Suggett, *supra* note 4.

III. REDEFINING THE EDUCATION COMMUNITY

The objective of the new law is “to guarantee our people a free, accessible, liberatory, and secular education that definitively guarantees teacher stability and autonomy.”¹⁶ To accomplish this, the Law redefines the structure of the education system and its constituent parts.¹⁷ Specifically, Article 20 emphasizes the community role in education, including parents, teachers, administrative workers, laborers, and community organizations in the definition of the educational community.¹⁸ Families are given the responsibility of instilling certain enumerated values and principles in their children as part of the joint education effort between families, schools, society, and the state.¹⁹ This joint relationship was exaggerated into a rampant rumor that Articles 3 and 4 somehow give the State the authority to take custody of children for “civic and mental training.”²⁰ But the enacted law cannot be read in any light to authorize such actions.²¹ This oppositional propaganda was successful in creating mass confusion regarding the Education Law and attracting national attention, criticism, and public violence.²²

Contrary to the inclusive nature of the educational community, religious groups are explicitly excluded by Article 7, which demands State educational matters be secular and independent from religious bodies.²³ This provision is the source of much divisiveness and discontent, as the Catholic Church, religious groups, and religious supporters feel the Law threatens their role in Venezuelan culture.²⁴ Catholic leaders and students have clashed with Chavez in the past, and the secularization of schools only intensifies the divide.²⁵ The Catholic Church is uncertain of the future for its existing system of elementary and high schools serving the poor.²⁶ As Cardinal Urosa said, “We’ll see how we will manage to carry forward education.”²⁷

In defense of these accusations, proponents of the Law emphasize that “[w]hile religious education will not be prohibited in schools, neither will it be obligatory in the curriculum.”²⁸ The language of the statute itself delegates religious education to the parents and affirms the freedom of

16. *Id.*

17. Ley Orgánica de Educación, art. 24.

18. *Id.* art. 20; Pabian, *supra* note 13.

19. Ley Orgánica de Educación, art. 17.

20. *Id.* art. 3-4; Suggett, *supra* note 3.

21. Ley Orgánica de Educación, arts. 3-4; Suggett, *supra* note 3.

22. Fact Sheet: Venezuela's New Education Law Myth and Reality, *supra* note 1; Venezuelan People Showed Support to the Organic Law of Education, RADIO NACIONAL DE VENEZUELA, Aug. 14 2009, available at <http://www.rnv.gov.ve/noticias/index.php?act=st&f=31&t=105255>.

23. Ley Orgánica de Educación, art. 7.

24. Posting of rowlandkeshena, *supra* note 2; Suggett, *supra* note 3.

25. Venezuelan Cardinal Says New Law Removes Religious Education from Schools, VHeadline.com, Aug. 25, 2009, <http://www.vheadline.com/readnews.asp?id=83310>.

26. *Id.*

27. *Id.*

28. Embassy of the Bolivarian Republic, *supra* note 1; Suggett, *supra* note 3.

religious belief under the Constitution.²⁹ But these assurances and safeguards have not satisfied many opponents of the Law and protests on the issue continue.³⁰ The Catholic Church's campaign against the legislation is a major issue for the State to overcome, as religion has traditionally been, and continues to be, a pervasive influence in the people of Venezuela's lives.³¹

IV. THE INCREASED ROLE OF THE STATE

The comprehensive nature of the new law provides for more control by the government at all levels of the education system.³² Fear of "indoctrination" of students and authoritarian rule have many opposed to this method of reform.³³ Past statements by Chavez, such as the following, have not served to calm fears of authoritarian reign over the educational system: "All of the schools in the nation must apply this curriculum. . . [and] [a]ny school which does not comply—to be nationalized! Any university which does not comply—to be nationalized!"³⁴ Furthermore, Chavez declared that if the director of any "educational center. . . is very stubborn and resists—he goes to jail, and that's it! That's the law."³⁵

The "concept of the "Educator State" (Estado Docente) is introduced in Article 5."³⁶ This foundation makes it the responsibility of the State to ensure education "as a universal human right and a fundamental, inalienable, non-renounceable social duty, and a public service. . . governed by the principles of integrality, cooperation, solidarity, attentiveness, and co-responsibility."³⁷ Included under this premise are nearly fifty specific duties to be organized by the State, along with other far-reaching mandates on the new educational structure.³⁸

The Law is founded on and intended to be applied in accordance with the Bolivarian Doctrine supported by Chavez.³⁹ The focus of the Bolivarian Revolution is to "develop the potential of Latin America and to achieve Simón Bolívar's dream of South American political-economic integration and *grandeza* (magnificence), to reduce U.S. hegemony in the region, and to change the geopolitical map of the Western Hemi-

29. Ley Orgánica de Educación, art. 7 (Venez.), available at www.eluniversal.com/2009/08/17/LOE.pdf.

30. Jeremy Morgan, *Venezuela Education Law Continues to Stir Criticism*, *LATIN AM. HERALD TRIB.*, Oct. 6, 2009, <http://www.laht.com/article.asp?ArticleId=341718&CategoryId=10717>.

31. Posting of rowlandkeshena, *supra* note 2; *Venezuelan Cardinal Says New Law Removes Religious Education from Schools*, *supra* note 25.

32. Suggett, *supra* note 3.

33. *Id.*; *Hugo Chavez Seeks to Catch Them Young*, *supra* note 8.

34. Ceaser, *supra* note 11.

35. *Id.*

36. Ley Orgánica de Educación, art. 5; Suggett, *supra* note 3.

37. Suggett, *supra* note 3.

38. *Id.*

39. *Hugo Chavez Seeks to Catch Them Young*, *supra* note 8.

sphere.”⁴⁰ Chavez also embraces the idea of “21st-century socialism,” a nationalistic model he set out in 2005.⁴¹ The “five motors” of “21st-century socialism” consist of: “the granting of enabling powers to the executive. . . constitutional reform; educational reform; expansion of communal power; and creation of a new geometry of power.”⁴²

Connecting the new Education Law to these broad national plans, many fear, is “deepening. . . the government’s authoritarian tendencies” in Venezuela.⁴³ The word “socialist” is never used within the text of the Law; however, the broad principles it advocates are not far removed from a socialist doctrine.⁴⁴ For example, the National Development Plan supports “‘socialist ethic’ and ‘revolutionary protagonist democracy,’” as part of Chavez’s vision for Venezuela’s future.⁴⁵ Some view socialism as “a society committed to meeting the basic needs of all people including health, food, education, and housing, where there is no poverty and full employment, where enterprises and firms are socially and publicly owned not privately owned by capitalists to make profits.”⁴⁶ For many, however, socialism conjures up a much less utopian picture, and is actually a threatening concept associated with anti-capitalism and authoritarian institutionalization, ideals that are highly contradictory to the principles championed by many other countries across the globe.

V. POLITICS IN THE CLASSROOM

A primary concern stemming from increased state control is the politicization of schools and pushing political agendas on children in the classroom.⁴⁷ The concept of “participatory democracy” has drawn significant attention because opponents fear schools will only encourage participation that promotes the majority ideology, since schools will be under supervision of “community councils.”⁴⁸ Based on Article 15, schools are “to develop a new political culture based on protagonist participation and the strengthening of popular power” and the “formation of citizenship and community participation, [and] for reconstruction of the public spirit.”⁴⁹ Despite the nationalistic undertones, the new law explicitly pro-

40. MAX G. MANWARING, *VENEZUELA’S HUGO CHAVEZ, BOLIVARIAN SOCIALIST AND ASYMMETRIC WARFARE 2* (2005), available at <http://strategicstudiesinstitute.army.mil/pdffiles/PUB628.pdf>.

41. *Id.*

42. Julia Buxton, *The Deepening of Venezuela’s Bolivarian Revolution: Why Most People Don’t Get It*, OPENDEMOCRACY, May 3, 2007, http://www.opendemocracy.net/democracy-protest/deepening_revolution_4592.jsp.

43. *Id.*; Sussman, *supra* note 1; see also *Hugo Chavez Seeks to Catch Them Young*, *supra* note 8.

44. Suggett, *supra* note 3.

45. *Id.*

46. Peter Bohmer, *Venezuela: Socialism for the 21st Century*, VENEZUELANALYSIS.COM, Aug. 5, 2009, <http://www.venezuelanalysis.com/analysis/4690>.

47. *Id.*; *Fact Sheet: Venezuela’s New Education Law Myth and Reality*, *supra* note 1; Sussman, *supra* note 1.

48. Suggett, *supra* note 3; *Hugo Chavez Seeks to Catch Them Young*, *supra* note 8.

49. Ley Orgánica de Educación, art. 15; Suggett, *supra* note 3.

hibits party politics or propaganda in the classroom in Article 12.⁵⁰

This is of little solace to many opponents, as visions of a totalitarian education system and restrictions of media and messages contrary to national sovereignty overpower faith in the promise of a non-partisan environment.⁵¹ As clarified by the State, however, the Law does not pertain to media except to guarantee cooperation and consistency with the education system and the Constitution of the Republic.⁵² Articles 10, 11, and 12 do impose some limitations on the type of messages allowed within educational institutions and centers; however, restrictions on promoting hatred or violence, and that which is against the Constitution, are not likely the type of limitations imagined by those truly concerned about protecting the free flow of ideas.⁵³

VI. UNIVERSITY SYSTEM

Throughout history, Venezuela's education system has been molded and formed by leaders and organizations as they cycled in and out of power.⁵⁴ Initially education was imparted through the Roman Catholic Church and reserved for wealthy landowners' children.⁵⁵ Influenced by the liberalism and structure of the French educational system, Simon Bolívar initiated the idea of free education in Venezuela.⁵⁶ Although not immediately implemented, these ideas ultimately led to the establishment of compulsory education and state financed university systems, providing tuition, housing, transportation, and meals to all students.⁵⁷ Today the university system is comprised of a combination of public universities run by the State and autonomous universities that operate independently.⁵⁸

A primary goal of the Education Law is to combat problems dealing with the conduct of certain autonomous universities.⁵⁹ The university structure is essentially unchanged by the Law; however, the establishment of guiding principles of autonomy is aimed to eliminate problems including corruption and violence on university campuses.⁶⁰ For instance, autonomous universities have allowed violent demonstrations, storage of weapons, and the provision of refuge to protestors because state security forces cannot legally come on campus.⁶¹ The new law uses constitutional

50. Ley Orgánica de Educación, art. 12; Suggett, *supra* note 3.

51. Ley Orgánica de Educación, art. 11; Pabian, *supra* note 13.

52. Ley Orgánica de Educación, art. 9; *Fact Sheet: Venezuela's New Education Law Myth and Reality*, *supra* note 1.

53. Ley Orgánica de Educación, art. 10-12.

54. VENEZUELA: A COUNTRY STUDY (Richard A. Haggerty, ed., Washington: GPO for the Library of Congress, 1990), available at <http://countrystudies.us/venezuela/19.htm>.

55. *Id.*

56. *Id.*

57. Caitlin McNulty, *Inclusive Education in Venezuela*, Aug. 24, 2009, available at <http://venezuelanalysis.com/analysis/4742>.

58. Suggett, *supra* note 3.

59. *Id.*

60. *Id.*; Ley Orgánica de Educación, art. 34.

61. Suggett, *supra* note 3.

principles as the standard for autonomous university conduct and the implementation of additional oversight to encourage universities to stop aiding violent opposition groups.⁶² Although the government funds autonomous campuses, the universities maintain flexibility and decision making authority on almost all issues.⁶³

Some are concerned that this additional control will stifle intellectual freedom on university campuses.⁶⁴ But Articles 34 and 36 adamantly maintain that academic freedom and methodology will be respected within the constraints of the Constitution.⁶⁵ The Law provides that “academic freedom, [is] understood to be the inalienable right to create, expound or apply methodological focuses and theoretical perspectives, in conformity with the principles established in the Constitution and the law.”⁶⁶ Also, the statute mandates that university authorities be elected in a democratic manner that involves all levels of the education community.⁶⁷ It is hoped that this process will not only protect intellectual freedom and integrity, but also serve to promote cooperation and responsibility as advocated by the general provisions of the Law.⁶⁸

The other major goal of the Law pertaining to universities is to promote “equity in admission” and create greater access for students of all socioeconomic backgrounds.⁶⁹ The Law makes clear that it intends to include students from all backgrounds and educational settings and promote diversity amongst the programs.⁷⁰ Articles 27 through 31 enumerate specific plans for intercultural and bilingual education, border education, rural education, military education, and special education.⁷¹ By responding to demands of commonly overlooked student sectors, the Law attempts to break down the barriers that contribute to disproportionate enrollment statistics and admit more students from poor families, which would take voting power away from the current education officials who are thus opposed to the bill.⁷² There is a particular focus on the indigenous population and improving multicultural education.⁷³ The Law seeks to reinforce the idea that native people have “the right to their own education, and an education system of an intercultural and bilingual nature, taking into account their special social and cultural characteristics, values, and traditions.”⁷⁴

62. *Id.*; Ley Orgánica de Educación, art. 34.

63. *Id.*

64. *Fact Sheet: Venezuela's New Education Law Myth and Reality*, *supra* note 1; Pabian, *supra* note 13.

65. Ley Orgánica de Educación, arts. 34, 36; Suggett, *supra* note 3.

66. Suggett, *supra* note 3.

67. Ley Orgánica de Educación, art. 34; *Fact Sheet: Venezuela's New Education Law Myth and Reality*, *supra* note 1.

68. *Id.*

69. Ley Orgánica de Educación, art. 35; Suggett, *supra* note 3.

70. Ley Orgánica de Educación, art. 24.

71. *Id.* arts. 27, 28, 29, 30, 31.

72. *Id.* art. 26; Pabian, *supra* note 13, at 2.

73. Ley Orgánica de Educación, art. 27.

74. Constitución Bolivariana, art. 121.

Venezuela's Higher Education Ministry has proposed new admissions policies, which include "automatic university admission for all high school graduates who satisfy basic grade and behavioral requirements and wish to obtain a university education."⁷⁵ Additionally, the Ministry has considered expanding the number of universities in Venezuela and using new testing procedures that focus on finding the right university program for each student.⁷⁶ These steps will be the first of many required to effectively incorporate the fundamentals of the new law into the existing educational system.⁷⁷

VII. BEYOND THE TRADITIONAL SCOPE OF EDUCATION

Although the focus of the Law is clearly on education, the National Assembly incorporated principles that reach beyond what is traditionally considered the education sector.⁷⁸ Chavez stated, "[we need] education for liberation, for socialism," and to prevent children from being "contaminated with the vices of the past, of capitalism, [of] selfishness."⁷⁹ Education goals in the Law include the creation of a new energy production model, non-discrimination and tolerance guidelines, ecological and environmental awareness, and nuclear disarmament.⁸⁰ Another recurring principle is the defense of human rights, which is mentioned in at least five separate articles of the Education Law.⁸¹ References to goals such as "learning to peacefully coexist" and "valuing the common good" are examples of the Law's idealistic nature and lack of concrete plans to achieve these vague truisms.⁸² Although some see this all-encompassing structure as an intellectual and progressive model for change, others fear this law is just a way for the national government to increase its grip on all aspects of society.⁸³

VIII. REACTIONS AND ISSUES SINCE ENACTMENT

In addition to the new ideas embodied in the Education Law, Chavez has initiated other movements in education reform.⁸⁴ One of multiple social missions organized in 2003, "Mission Robinson" is a highly publicized program aimed at ending illiteracy in Venezuela.⁸⁵ The ultimate goal is to be able to declare the country "illiteracy free;" however, the

75. Suggett, *supra* note 3.

76. *Id.*

77. *Id.*

78. Ley Orgánica de Educación, art. 15; Suggett, *supra* note 3.

79. Pabian, *supra* note 13, at 2.

80. Ley Orgánica de Educación, art. 15.

81. Ley Orgánica de Educación, arts. 6, 10, 14, 15, 33; Suggett, *supra* note 3.

82. See Suggett, *supra* note 3; see also *Hugo Chavez Seeks to Catch Them Young*, *supra* note 8.

83. See Suggett, *supra* note 3; see also Sussman, *supra* note 1.

84. Hilma Kupila Shindondola, *Namibia: Lessons from Hugo Chavez*, AFR. NEWS, Oct. 19, 2007, <http://allafrica.com/stories/200710190408.html>.

85. *Id.*

success of the program has been disputed.⁸⁶ While some champion the program with success stories that describe the program as a life changing experience, others are quick to point out the many individuals that fell short of aspirations.⁸⁷ Another 2003 initiative in the education sphere is "Mission Ribas," which helps students who dropped out or never enrolled complete their high school degree in two years by taking classes in the evenings and on weekends.⁸⁸ Programs such as these are aimed at decreasing the unemployment rate, increasing the literacy rate, and creating economic growth across the territory.⁸⁹

As previously discussed, the long process to enactment was anything but smooth.⁹⁰ Months of protests, campaigning, and propaganda created a hostile environment for all and served to further divide the country as the National Assembly finalized the Education Law.⁹¹ But, the protests have only intensified since Chavez signed it into effect.⁹² Right-wing opposition continues to fight against liberalizing changes and cling to their traditional beliefs, while Chavez, the National Assembly, and their supporters struggle to create favor for the new law and fight off rampant rumors and falsities about its content and purpose.⁹³ The violence and upheaval has thrust Venezuela and the Organic Education Law into the national media spotlight, however, the focus has been on anything and everything except the actual content of the education reform law.⁹⁴

The Bolivarian government faces many challenges as it attempts to implement the Law in any meaningful way.⁹⁵ In addition to warding off threats of sabotage as the new school year begins and quieting the violent protests, the practicalities of imposing such vast and complex changes to the existing education system will be a huge challenge.⁹⁶ Additional "laws of lower legal stature" are still necessary to transform the fundamental values of the Organic Education Law into a practical governing tool that can be enforced.⁹⁷ Changing values and methodologies that are engrained in the Venezuelan people's tradition and culture is a much more complex and difficult task than instilling a regimented system that does not require democratic decision-making and cooperation by the people; however, if successful, it will also be a much greater accomplish-

86. *Propaganda, Not Policy*, ECONOMIST, Mar. 1, 2008, available at <http://www.highbeam.com/doc/1G1-175563264.html>.

87. *Id.*

88. Sarah Wagner, *Vuelvan Caras: Venezuela's Mission for Building Socialism of the 21st Century*, VENEZUELANALYSIS.COM, July 8, 2005, <http://www.venezuelanalysis.com/analysis/1234>.

89. *Id.*

90. See Posting of rowlandkeshena, *supra* note 2; see also *Venezuela's Revolution Reaches the Classroom*, *supra* note 11.

91. Posting of rowlandkeshena, *supra* note 2.

92. *Id.*

93. *Id.*

94. *Id.*; Sussman, *supra* note 1.

95. See Suggett, *supra* note 3.

96. See Posting of rowlandkeshena, *supra* note 2; see also Suggett, *supra* note 3.

97. Posting of rowlandkeshena, *supra* note 2.

ment and strengthen the country.⁹⁸

IX. CONCLUSION

The Organic Education Law is a controversial piece of legislation that has already had a major effect on Venezuelan society and will continue to be important for many years to come.⁹⁹ The ideology advocated in the bill and the intense reaction it has created within Venezuela evidences the deep political, social, and intellectual divide that exists amongst the people of this constantly evolving country.¹⁰⁰ Creation of an effective education system, as well as a cohesive cooperative society as a whole, is not a task that can be accomplished by passing one bill.¹⁰¹ Chavez and the Venezuelan people have many more obstacles and milestones ahead, as the country continues to grow, change, and progress.¹⁰²

98. See Suggett, *supra* note 3.

99. See Suggett, *supra* note 4.

100. See *id.*

101. See Suggett, *supra* note 3.

102. See *id.*

Updates

